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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

STEVEN B. POLLACK and BLUE ECO )  
LEGAL COUNCIL, )

Plaintiffs, )

v. )

UNITED STATES DEPARTMENT OF )  
JUSTICE, UNITED STATES COAST )  
GUARD, UNITED STATES NAVY, )  
UNITED STATES MARINE CORPS, and )  
UNITED STATES DEPARTMENT OF )  
DEFENSE, )

Defendants. )

No. 08 C 320  
Judge Guzmán

**PROTECTIVE ORDER**

Plaintiffs Steven B. Pollack and the Blue Eco Legal Council ("Plaintiffs") have requested an opportunity walk through structures located at the FBI's North Chicago Regional Training Facility in North Chicago, Illinois ("FBI Range"). After discussions among counsel, and pursuant to this Court's direction, the parties have agreed as follows:

- (1) FBI personnel shall provide an escorted tour of buildings at the FBI Range.
- (2) That tour shall include entry into locked areas of the range that are typically "off limits" to range users.
- (3) Only Steven B. Pollack, Plaintiffs' counsel, and James Barton, Plaintiffs' expert, shall be granted entry into structures at the FBI Range.
- (4) No pictures, video, or other recording of the interior of the buildings shall be attempted or allowed.

U.S. DISTRICT COURT  
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(5) The purpose of this tour is to allow Mr. Pollack and Mr. Barton an opportunity to visually inspect the interior of the buildings at the FBI Range. Neither Mr. Pollack nor Mr. Barton shall test, handle, or otherwise touch any items or things contained within the buildings.

(6) Without the prior written agreement of Defendants, there shall be no public disclosure directly or indirectly, by any means, of any information gained by viewing the interior of the buildings at the FBI Range. Any filings that reference information gained by viewing the interior of the buildings shall be filed under seal.

(7) Prior to entering any building at the FBI Range, both Mr. Pollack and Mr. Barton shall execute the Acknowledgement of Protective Order attached hereto as Exhibit A.

IT IS SO ORDERED.

Dated: 4/25/08

  
JUDGE RONALD A. GUZMAN

# EXHIBIT A

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and UNITED STATES DEPARTMENT )  
OF DEFENSE, )  
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**ACKNOWLEDGMENT OF PROTECTIVE ORDER**

I, \_\_\_\_\_, hereby acknowledge, under penalty of perjury, that I have read the Protective Order entered by the Court on \_\_\_\_\_, 2008. I am familiar with the specific terms of the Protective Order and agree to be bound by its terms. I further understand that I am subject to the contempt powers of this Court for violation of the Protective Order.

Date: \_\_\_\_\_